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UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF CALIFORNIA

JENS ERIK SORENSEN, as Trustee of SORENSEN RESEARCH AND DEVELOPMENT TRUST, Plaintiff v. MOTOROLA, INC., a Delaware Corporation; and DOES 1 – 100, Defendants. ______________________________ and related counterclaims. ______________________________	Case No. 08cv136 BTM CAB **REPLY TO COUNTERCLAIMS OF MOTOROLA, INC.**

//

Plaintiff/Counterdefendant Jens Erik Sorensen as Trustee of Sorensen Research and Development Trust ("SRDT"), hereby respectfully replies to the specific numbered paragraphs identified of the Counterclaims of Defendant/Counterclaimant Motorola, Inc. as follows:

Parties

37. Upon current information and belief, admit.

38. Admit.

Jurisdiction and Venue

39. Admit.

40. Admit.

41. Admit.

Count I

42. SRDT incorporates by reference the responses to paragraphs 37 through 41 as though fully set forth herein.

43. Deny.

Count II

44. SRDT incorporates by reference the responses to paragraphs 37 through 43 as though fully set forth herein.

45. Deny.

WHEREFORE, SRDT prays that judgment on Motorola, Inc.'s counterclaims be entered as follows:

a. For judgment in favor of SRDT and against Motorola, Inc. on all requested relief;

b. That this case be decreed an "exceptional case" and SRDT is awarded reasonable attorneys' fees by the Court pursuant to 35 U.S.C. § 285;

c. For costs of suit herein incurred;

d. For such other and further relief as the Court may deem just and proper.

DATED this Thursday, April 24, 2008.

JENS ERIK SORENSEN, as Trustee of
SORENSEN RESEARCH AND DEVELOPMENT
TRUST, Plaintiff

/s/ Melody A. Kramer

J. Michael Kaler, Esq.
Melody A. Kramer, Esq.
Attorney for Plaintiff

PROOF OF SERVICE

I, Melody A. Kramer, declare: I am and was at the time of this service working within in the County of San Diego, California. I am over the age of 18 year and not a party to the within action. My business address is the Kramer Law Office, Inc., 9930 Mesa Rim Road, Suite 1600, San Diego, California, 92121.

On Thursday, April 24, 2008, I served the following documents:

REPLY TO COUNTERCLAIMS OF MOTOROLA, INC

PERSON(S) SERVED	PARTY(IES) SERVED	METHOD OF SERVICE
RACHEL M. CAPOCCIA Hogan & Hartson L.L.P. 1999 Avenue of the Stars, Suite 1400 Los Angeles, California 90067 rmcapoccia@hhlaw.com	Motorola, Inc.	Email--Pleadings Filed with the Court via CM/ECF
Erik J. Lobenfeld Hogan & Hartson LLP 875 Third Avenue New York, NY 10022 EJlobenfeld@hhlaw.com	Motorola, Inc.	Email--Pleadings Filed with the Court via CM/ECF

☐ (Personal Service) I caused to be personally served in a sealed envelope hand-delivered to the office of counsel during regular business hours.

☐ (Federal Express) I deposited or caused to be deposited today with Federal Express in a sealed envelope containing a true copy of the foregoing documents with fees fully prepaid addressed to the above noted addressee for overnight delivery.

☐ (Facsimile) I caused a true copy of the foregoing documents to be transmitted by facsimile machine to the above noted addressees. The facsimile transmissions were reported as complete and without error.

☐ (Email) I emailed a true copy of the foregoing documents to an email address represented to be the correct email address for the above noted addressee.

[X] (Email--Pleadings Filed with the Court) Pursuant to Local Rules, I electronically filed this document via the CM/ECF system for the United States District Court for the

Southern District of California.

☐ (U.S. Mail) I mailed a true copy of the foregoing documents to a mail address represented to be the correct mail address for the above noted addressee.

I declare that the foregoing is true and correct, and that this declaration was executed on Thursday, April 24, 2008, in San Diego, California.

/s/ Melody A. Kramer

Melody A. Kramer